

Exhibit 3

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
No. 1:20-cv-00613-CCE-LPA**

**NATIONAL ASSOCIATION FOR)
THE ADVANCEMENT OF)
COLORED PEOPLE ALAMANCE)
COUNTY BRANCH, et al.)
)
Plaintiffs,)
)
v.)
)
JERRY PETERMAN, et al.,)
)
Defendants.)**

DECLARATION OF MAURICE WELLS, JR.

1. My name is Maurice Wells, Jr. I am African American and a resident of Alamance County. I am over the age of eighteen and am competent to provide the information that follows based upon my personal knowledge.
2. At around 10:00am on Tuesday, August 4, 2020, I drove to the Historic Courthouse in Graham, parked my car on South Main Street about a block away from the Court Square, and walked to the Courthouse using the crosswalk from South Main to the south entrance. I used the sidewalk around the west side of the Courthouse to walk to the north entrance. I was wearing a Black Lives Matter T-shirt and carrying a small sign printed with “Black Lives Matter.”
2. I wanted to go stand on the Courthouse’s north entrance steps with my sign to protest racial injustice, including systemic racism and police brutality perpetrated against people of color by law enforcement officers in Alamance County. I chose the Courthouse’s north entrance for my protest because that is the main entrance that people use and I wanted to engage the public on these issues. I also want to protest there because that is where the Confederate monument stands. Below is a photo which fairly and accurately depicts what the area near the monument and north entrance to the Courthouse looked like when I was there on August 4:



4. My ancestral family lived in Alamance County as far back as we can trace (the year 1863). So that monument is a constant reminder to me of the oppression my ancestors suffered at the hands of white people in Alamance County. I want to protest on the sidewalk beside that monument (the reddish part of the crosswalk beside the fenced-off monument mound in the above photo, near the flag pole on the sidewalk behind the monument and in front of the steps as seen in the above photo) because I am protesting my local government's continuing celebration of the Confederacy and white supremacy which that monument symbolizes placed where it is.
5. The photo below fairly and accurately depicts the sidewalk next to the monument and the sidewalk area to the right of the steps (in the photo, about where the lady with white pants is) where I was standing when Deputy Neece of the Alamance County Sheriff's Office (ACSO) got out of her patrol vehicle, which was parked beside the reddish sidewalk adjacent to the monument, and approached me. She told me "You can't protest here during court hours; you need to go to the other side of the street (pointing to the Sesquicentennial Park)."



6. I asked Deputy Neece if that was a lawful order, and she went away for a half hour, came back and told me I couldn't protest there during business hours. I obeyed her order because I did not want to get arrested. Using the crosswalk to North Main, I crossed the street and stood on the corner near the fire hydrant on Sesquicentennial Square. I was there with my sign for a bit over an hour by myself, until noon, when I left to go get some lunch.
7. I used the North Main crosswalk to cross through Court Square to get back to my car. I folded up my sign as I reached the sidewalk in front of the courthouse; however, Deputy Neece, who was standing on the steps in front of the north entrance, approached me and said "You can't stand here." I said, "But I'm not protesting, I folded up my sign." I gestured to the white man sitting on the raised curb on the west side of the north entrance, and said "How can he be here and I can't?" She responded, "He is waiting on a ride," and I said, "How do you know I'm not waiting on my ride?" She said "I know you are not." I said, "It is not fair for him to be able to be here but I'm not." She said something about my shirt, and I said, "So are you saying I cannot wear this shirt?" She said, "No, you just cannot stand here. Leave the property." I left.
8. On August 10, after I got off work, I drove to the Courthouse and parked on the southwest side in Court Square, arriving around 5:30pm. Carrying a Black Lives Matter sign, I walked to the northwest side of the north entrance and stood on the sidewalk. Two women, whom I did not know but who told me they live in

Burlington, joined me after a while. One of the women was wearing a Black Lives Matter t-shirt, and I let the other woman hold my sign while I raised my fist in the air.

9. A white man wearing a black polo shirt and brown pants got out of a white car, which was parked behind the monument and blocking the crosswalk between the monument and the courthouse steps and came over to talk with us. He introduced himself as "Matt," said he was a Sergeant and Supervisor Investigator in the ACSO's High Crimes Division. He was very friendly and talked to us for a while. He told us that the High Crimes Division was assigned to guard the monument from 5pm throughout the night. I told him that I thought it was a waste of taxpayer money and valuable resources to have the High Crimes Division doing that. We had a good conversation off and on until he left around 8pm. He told me I had to leave by 8:30pm and I told him I was planning on staying longer and they would have to order me to leave.
10. Deputy Herron replaced the Sergeant to watch the monument, and we talked too, as he was also very friendly. He did order me to leave at 8:30pm, which I did so that I would not be arrested.

I declare under penalty of perjury that the foregoing is true and correct. Executed on August 11, 2020.

Maurice Wells Jr.

Maurice Wells, Jr.